

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**UNITED STATES OF AMERICA,**  
**Plaintiff,**

**v.**

**CHRISTOPHER AUNDRE FAULKNER,**  
**Defendant.**

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**Case No: 3:18-CR-500-B**

**JOINT MOTION TO REMOVE CASE FROM TRIAL DOCKET**  
**AND SET STATUS CONFERENCE**

**TO THE HONORABLE JUDGE OF SAID COURT:**

1. The government and the defendant jointly move the Court to remove the case from the trial and set a status conference for the end of March 2020. In support, the parties would show as follows.
2. On May 29, 2019, the defendant was charged by a superseding indictment with six counts of securities fraud in violation of 15 U.S.C. §§ 77q (a)) and 77x, seven counts of mail fraud in violation of 18 U.S.C. § 1341, six counts of money laundering in violation of 18 U.S.C. § 1957, and two counts of tax evasion in violation of 26 U.S.C. § 7201.
3. On July 16, 2019, this Court declared the case complex and issued a Pretrial Scheduling Order. (Dkt#81). The case is currently set for a jury trial on March 16, 2020; pretrial motions are due January 27, 2019; and pretrial materials are due February 24, 2020.

4. On November 21, 2019, the Court held a status hearing. At the status hearing, the Court requested the parties file a motion with a proposed case scheduling order on or before December 6, 2019.
5. This case has been designated complex due to the nature of the prosecution, the complexity of the facts underlying the indictment, and the voluminous nature of the discovery. The case involves the sale of working interests in various oil and gas properties to over a thousand investors between 2010 and 2016. Over \$149 million of investor funds flowed through approximately one hundred bank accounts associated with the defendant or his companies. The investigative materials obtained by the government are extensive. Agents imaged 90 electronic devices during search of the defendant's office that contain approximately 86 terabytes of data. The government obtained additional records from the Securities and Exchange Commission which are over 600 gigabytes. Additional records obtained by subpoenas, voluntary disclosures, and other investigative methods exceed 25 gigabytes.
6. The government is still in the process of disclosing discovery. It is anticipated that full discovery will not be completed until sometime around the end March 2020. Given the voluminous nature of discovery and the need for defense counsel to organize, analyze and process the discovery, there will be a considerable amount of time needed to fulfill the discovery processing phase *after* the completion of the government's disclosure of discovery.
7. The parties request that the Court remove the case from the trial docket and schedule a status conference for the end of March 2020. At this status conference, the parties will likely be in a better position to advise the Court on discovery issues, case preparation

time for trial, and a realistic trial date given the complexity and voluminous nature of the case.

**JOINTLY AGREED AND SUBMITTED:**

s/Christopher Stokes

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 5, 2019 this document was served on counsel for the government, AUSA Christopher Stokes, by electronically filing the pleading with the clerk of court for the U.S. District Court, Northern District of Texas using the ECF system.

/s/ Kevin B. Ross

Kevin B. Ross